



U.S. Department of Justice

United States Attorney
Southern District of New York

26 Federal Plaza, 37th Floor
New York, New York 10278

April 4, 2025

The Honorable Arun Subramanian
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *United States v. Combs*, S3 24 Cr. 542 (AS)

Dear Judge Subramanian:

The Government respectfully submits this letter regarding the S3 Indictment returned yesterday in the above-referenced case by a Grand Jury sitting in this District (the “S3 Indictment”).

The S3 Indictment contains three substantive changes to the charged offenses. *First*, Count Four charges an additional substantive count of sex trafficking by force, fraud, or coercion, with respect to Victim-2. (See S3 Indictment ¶ 19). Victim-2 was previously identified as a victim of sex trafficking in Count One of the S2 Indictment. *Second*, Count One has been amended to include a second special sentencing factor related to the new sex trafficking offense charged in Count Four. (See *id.* ¶ 16). *Third*, the S3 Indictment charges the Mann Act in two separate counts in Counts Three and Five covering conduct for Victim-1 and Victim-2, respectively. (*Id.* ¶¶ 18, 20). The S2 Indictment previously charged this conduct as a single Mann Act offense. In addition, the language of Count One contains two non-substantive changes clarifying that the defendant kidnapped and carried and displayed a firearm to female victim, and that the defendant dangled a female victim over an apartment balcony. (*Id.* ¶ 12(j)).

The Government has already produced all Rule 16 discovery and *Jencks* Act materials in its possession associated with the S3 Indictment and does not expect the S3 Indictment to affect existing pre-trial deadlines. The Government respectfully requests that the defendant be arraigned on the S3 Indictment at the final pre-trial conference scheduled for April 25, 2025.

Respectfully submitted,

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cc: Counsel of record (by ECF)